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HAGOP T. BEDOYAN, CSB No. 131285  
KLEIN, DENATALE, GOLDNER,  
COOPER, ROSENLIB & KIMBALL LLP  
5260 N. Palm Avenue, Suite 205  
Fresno, California 93704  
Telephone: (559) 438-4374  
Facsimile: (661) 326-0418  
E-mail: [hbedoyan@kleinlaw.com](mailto:hbedoyan@kleinlaw.com)

Attorneys for VI Healthcare Finance, Inc.

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

In re:

SOUTHERN INYO  
HEALTHCARE DISTRICT,

Debtor.

Case No. 16-10015-A-9

Chapter 9

DC NO.: KDG-2

Date: TO BE SCHEDULED  
Time: TO BE SCHEDULED  
Place: United States Bankruptcy Court  
2500 Tulare Street, Fifth Floor  
Department A, Courtroom 11  
Fresno, California  
Judge: Honorable Fredrick E. Clement

**REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM OF  
VI HEALTHCARE FINANCE, INC. (11 U.S.C. §§ 503(b) AND 507(a)(2))**

NOTICE IS HEREBY GIVEN that VI HEALTHCARE FINANCE, INC. ("Vi Healthcare") hereby asserts an Administrative Expense Claim (the "Claim"), secured by tax revenues, in the total amount of \$1,423,418.72, as of May 31, 2018 (the "Claim"), pursuant to 11 U.S.C. §§ 503(b) and 507(a) (2), and represents the following:

1. This claim is based upon various advances made to SOUTHERN INYO HEALTHCARE DISTRICT (the "Debtor") during the administration of the Debtor's case in accordance with the terms of a REVOLVING LINE OF CREDIT NOTE (SECURED) dated July 19, 2017 (the "Note"). A copy of the Note is attached as Exhibit "A".

2. The Claim arises out of four separate advances made to the Debtor by Vi Healthcare as set forth below:

Loan Number	Principal Bal.	Request Date	Funding/Payment Date	Interest Rate
H1	\$1,038,789.56	7/25/17	7/25/17	10%
V1	\$350,000.00	8/1/17	8/10/17	20%
V2	\$100,000.00	9/7/17	9/8/17	20%
V3	\$250,000.00	9/18/17	9/17/17	20%

Copies of the requests for funding are attached as Exhibit "B".

3. The Note is secured by an Assignment, Security Agreement and Pledge Agreement which are attached as Exhibit "C" (the "Security Agreement").

4. In accordance with the terms of the Security Agreement, Vi Healthcare is also the direct assignee of anticipated tax revenues from Inyo County, which is more specifically described in the Notice of Anticipated Tax Revenues attached as Exhibit "D".

5. The Claim includes interest from January 1, 2018 through May 31, 2018 in the amount of \$93,263.51 and reflects two payments received by Vi Healthcare from Inyo County in the respective amounts of \$253,628.45 and \$261,463.8, on January 8, 2018 and May 4, 2018.

6. Claimant reserves the right to amend this Claim and will set the matter for hearing at a future date.

Dated: 6/7/18

KLEIN, DENATALE, GOLDNER, COOPER,  
ROSENLIEN & KIMBALL LLP

By: 

HAGOP T. BEDOYAN,  
Attorneys for VI Healthcare Finance, Inc.